

EXHIBIT 4

From: Jessica Heinz <JHeinz@c-wlaw.com>
Sent: Monday, May 3, 2021 9:20 AM
To: 'Marlene Goldenberg'; Ernest Koschineg
Cc: Ben Stellpflug; Ashleigh Raso
Subject: RE: Aurobindo Document Retention/Destruction Policies
Attachments: Aurobindo Corporate Email Policy_V1 0_02May15.pdf

Marlene,

Attached, please find Aurobindo's Corporate Email Policy that I just received from my client. I will produce this formally later this week pursuant to the ESI Protocol, but I wanted to send it to you before the case management conference. Also, please see:

"General Procedure: Storage, Retention, Retrieval, and Disposal of Documents" (APL-MDL 2875-0100332).
"Oracle ERP Data Backup" (Auro-MDL 2875-0080204)
"Oracle Disaster Recovery and Business Continuity" (Auro-MDL 2875-0080207)

Best regards,
Jessica

JESSICA M. HEINZ | Partner

CIPRIANI & WERNER PC

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From: Marlene Goldenberg <mjgoldenberg@goldenberglaw.com>
Sent: Tuesday, April 27, 2021 3:35 PM
To: Jessica Heinz <JHeinz@c-wlaw.com>; Ernest Koschineg <EKoschineg@c-wlaw.com>
Cc: Ben Stellpflug <bstellpflug@goldenberglaw.com>; Ashleigh Raso <araso@meshbesh.com>
Subject: Re: Aurobindo Document Retention/Destruction Policies

Jessica,

Thanks for the response. These do not appear to be document retention or destruction policies. These seem to be SOPs largely relating to how documentation is created. I also do not see anything that would suggest Aurobindo has produced its policies relating to the retention or destruction of emails.

Please let me know if those have been produced.

Thanks again,

Marlene



Marlene J. Goldenberg • Partner

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From: Jessica Heinz <JHeinz@c-wlaw.com>

Sent: Tuesday, April 27, 2021 1:20 PM

To: Marlene Goldenberg <mjgoldenberg@goldenberglaw.com>; Ernest Koschineg <EKoschineg@c-wlaw.com>

Cc: Ben Stellpflug <bstellpflug@goldenberglaw.com>; Ashleigh Raso <araso@meshbesh.com>

Subject: RE: Aurobindo Document Retention/Destruction Policies

Marlene,

The Aurobindo parties' produced the following Standard Operating Procedures, identified by bates number, regarding documentation practices.

Aurobindo Pharma Ltd.

- ZQA021 – Document Control (APL-MDL 2875-0615091)
- KQA001 – Good Recording Practices (APL-MDL 2875-1090069 and APL-MDL 2875-1042681)
- KQC061 – Recording Flow of Quality Control Department Documents (APL-MDL 2875-0614615)
- ZQA042 – Data Integrity Monitoring (APL-MDL 2875-0615154)

APUSA

- QA843 – QAR Aurobindo Reports (Auro-MDL 2875-0261179, Auro-MDL 2875-0260365, Auro-MDL 2875-0260512, Auro-MDL 2875-0261007, and Auro-MDL 2875-0119575)
- QA858 – Performing Batch Record Review and Release of Aurobindo Lots (Auro-MDL 2875-0119856)
- QA806 – Document Control - Document Request, Numbering, Issuance and Reconciliation (Auro-MDL 2875-0119865)
- QA809 – GMP Documents Retention (Auro-MDL 2875-0112996 and Auro-MDL 2875-0113224)

Aurolife

- QA019 – Good Documentation Practices (Auro-MDL 2875-0119685)
- AL142 – Handling of Out of Trend Results in the Quality Control Laboratory (Auro-MDL 2875-0110505)
- AL140 – Handling of Lab Events in Quality Control Laboratory (Auro-MDL 2875-0111258 and Auro-MDL 2875-0111276)
- AL139 – Preparation, Validation and Control of Spread Sheets for Calculation of results in Quality Control (Auro-MDL 2875-0111107)
- QA039 – Batch Record Review and Release (Auro-MDL 2875-011820, Auro-MDL 2875-0110840, and Auro-MDL 2875-0110860)
- QA033 – Batch Production Record Control (Auro-MDL 2875-0110331, Auro-MDL 2875-0110355, Auro-MDL 2875-0110373, and Auro-MDL 2875-0110404)
- AL018 – Quality Control Laboratory Documentation and Review (Auro-MDL 2875-0112248, Auro-MDL 2875-0112260, Auro-MDL 2875-0112272, Auro-MDL 2875-0112283)

Best regards,
Jessica

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From: Marlene Goldenberg <mjgoldenberg@goldenberglaw.com>

Sent: Monday, April 26, 2021 10:17 AM

To: Ernest Koschineg <EKoschineg@c-wlaw.com>; Jessica Heinz <JHeinz@c-wlaw.com>

Cc: Ben Stellpflug <bstellpflug@goldenberglaw.com>; Ashleigh Raso <araso@meshbeshher.com>

Subject: Aurobindo Document Retention/Destruction Policies

Ernie and Jessica,

In advance Discovery Conference on Wednesday, I wanted to follow up on Aurobindo's document destruction and retention policies. I have not seen these noted in the production log or in the documents I've reviewed. Can you confirm whether these have been produced and if so what the bates numbers for those documents are, please?

Thank you,

Marlene



Marlene J. Goldenberg • Partner

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